

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

SAMMI D. WRIGHT,	:	
	:	
Plaintiff	:	
	:	
v.	:	NO. 1:CV-00-1657
	:	
BEULAH HADRICK,	:	(JURY TRIAL)
CHARLEEN SZABO,	:	
SCOTT SHREVE and	:	
RAY KENT,	:	(J. Conner)
	:	
Defendants	:	

JOINT MOTION TO STAY

Plaintiff Sammi Wright, through her attorney DON BAILEY, Esquire, and Defendants Beulah Hadrick, Charleen Szabo, Scott Shreve, and Ray Kent, through their attorneys, THOMAS A. MARINO, United States Attorney, and MARY CATHERINE FRYE, Assistant U.S. Attorney, request that this Court grant the within Motion to Stay, and in support thereof state:

1. On or about October 1, 2002, defendants filed their Motion for Judgment on the Pleadings or for Summary Judgment.
2. The said motion has been briefed and ripe for decision since October 23, 2002.
3. By Order dated January 31, 2003, this case was placed on the June, 2003 trial list.
4. Pretrial memoranda, and motions in limine are due May 7, 2003.
5. Proposed voir dire questions and proposed jury instructions

are due at the pretrial conference scheduled for May 14, 2003.

6. Final preparation for the trial of this case will require an extensive commitment of time of the part of counsel for plaintiff and defendants over the next five weeks.
 7. Should the Court grant defendants' pending dispositive motion, this time will have been wasted and will prove expensive for all parties.
 8. To avoid possibly unnecessary expenditure of time and resources, defendants respectfully request that the trial of this case and pretrial proceedings be stayed until the Court renders its decision on the pending dispositive motion.
 9. Both parties are in agreement with respect to this request.
- WHEREFORE, plaintiff and defendants respectfully request that the trial in this case be stayed until after the Court

renders a decision on defendants' pending Motion for Judgment on the Pleadings or for Summary Judgment.

Respectfully submitted,

THOMAS A. MARINO
United States Attorney

s/Don Bailey

DON BAILEY, Esquire
Bailey Stretton &
Ostrowski
4311 N. 6th St.
Harrisburg PA 17110
Harrisburg, PA 17110
(717
(717) 221-9500

Counsel for Plaintiff

s/Mary Catherine Frye

MARY CATHERINE FRYE
Assistant U.S. Attorney
I.D. 26615
228 Walnut Street
Harrisburg, PA 17108
(717) 221-4482
E-Mail: mary.catherine.frye@usdoj.gov

Counsel for Defendants

Dated: April 29, 2003

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

SAMMI D. WRIGHT,	:	
	:	
Plaintiff	:	
	:	
v.	:	NO. 1:CV-00-1657
	:	
BEULAH HADRICK,	:	(JURY TRIAL)
CHARLEEN SZABO,	:	
SCOTT SHREVE and	:	
RAY KENT,	:	(J. Conner)
	:	
Defendants	:	

CERTIFICATE OF SERVICE BY MAIL

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion to be competent to serve papers.

That this 29th day of April, 2003, she served a copy of the attached

JOINT MOTION TO STAY

by placing said copy in a postpaid envelope addressed to the person hereinafter named, at the place and address stated below, which is the last known address, and by depositing said envelopes and contents in the United States Mail at Harrisburg, Pennsylvania to:

Don Bailey, Esquire
Bailey, Stretton & Ostrowski
4311 North Sixth St.
Harrisburg, PA 17110-1614

s/Phyllis M. Mitchell
PHYLLIS M. MITCHELL
Supervisory Legal Assistant